UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

BRANDON COOPER,

Plaintiff,

-against-

THE OFFICE OF THE COMMISSIONER OF BASEBALL d/b/a MAJOR LEAGUE BASEBALL, and PDL BLUE, INC.,

Defendants.

SO ORDERED: 10/9/2024

HÖN. VERNON S. BRODERICK UNITED STATES DISTRICT JUDGE

Civil Case No.: 24-cv-3118

STIPULATION ALLOWING PLAINTIFF TO FILE AN AMENDED COMPLAINT

WHEREAS, on April 24, 2024, Plaintiff Brandon Cooper ("Plaintiff") filed his Complaint against The Office of the Commissioner of Baseball d/b/a Major League Baseball and PDL Blue Inc. ("Defendants") alleging a hostile work environment and wrongful termination because of his sexual orientation and gender and/or retaliation in violation under the New York State Human Rights and New York City Human Rights Law;

WHEREAS, Plaintiff seeks to file an amended complaint that, *inter alia*, adds claims under Title VII of the Civil Rights Act of 1964 and Alexander Lawrie as an additional Plaintiff;

WHEREAS, a copy of Plaintiff's proposed Amended Complaint is attached hereto as Exhibit A;

IT IS HEREBY STIPULATED AND AGREED, between Plaintiff and Defendants, by and through their respective counsel, that:

- Pursuant to Federal Rule 15(a)(2), Plaintiff may file his amended complaint that is attached hereto as <u>Exhibit A</u>;
- Defendants' deadline to answer, move, or otherwise respond shall be forty-five
 (45) days after the Amended Complaint is filed; and

3. In so stipulating, Defendants have not waived any defenses they may raise in response to the Amended Complaint.

Dated: October 7, 2024 JOSEPH & NORINSBERG, LLC

CAITLIN DUFFY

Attorneys for Plaintiff

Dated: October 7, 2024 EPSTEIN BECKER & GREEN, P.C.

/s/ Shira M. Blank

SHIRA M. BLANK

Attorneys for Defendants